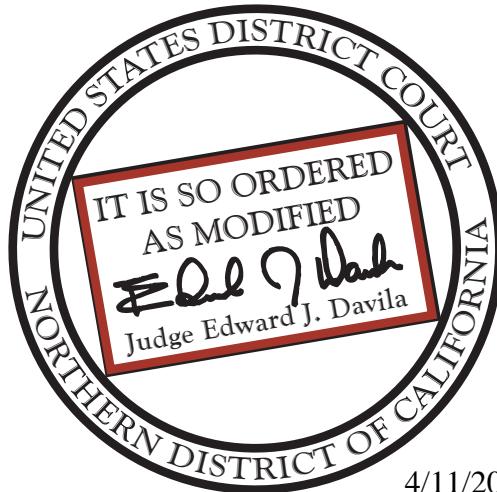


1 STEVEN G. KALAR
2 Federal Public Defender
3 ROBERT M. CARLIN
4 Assistant Federal Public Defender
5 160 West Santa Clara Street, Suite 575
6 San Jose, CA 95113
7 Telephone: (408) 291-7753
8 E-mail: westcliff3@gmail.com
9
10 Counsel for Defendant
11 JOSE MONDRAGON-SANCHEZ



4/11/2013

8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA

10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,) No. CR 13-00057-EJD
12 Plaintiff,) STIPULATION TO CONTINUE STATUS
13 vs.) CONFERENCE; [PROPOSED] ORDER
14 JOSE MONDRAGON-SANCHEZ,)
15 Defendant.)

16
17 Plaintiff United States of America, by and through Special Assistant United States
18 Attorney Meredith Edwards, and Defendant JOSE MONDRAGON-SANCHEZ ("Mr.
19 Mondragon"), by and through his attorney of record, Assistant Federal Public Defender Robert
20 Carlin, hereby stipulate that the status conference in this case should be continued from April 15
21 to May 6, 2013, at 1:30 p.m.

22 1. Mr. Mondragon has been charged in a single count Information, which was filed on
23 January 28, 2013, with a violation of 8 U.S.C. § 1326.

24 2. A status conference before this Honorable Court is scheduled for April 15, 2013, at
25 1:30 p.m.

26 ///

STIPULATION TO CONTINUE STATUS
CONFERENCE; [PROPOSED] ORDER
CASE NO. CR 13-00057

1 3. Counsel and Mr. Mondragon need additional time to review the discovery provided by
2 the government. Also, there is a legal issue that needs further research and discussion which
3 could significantly affect the disposition of Mr. Mondragon's case.

4 4. Mr. Mondragon respectfully requests that the status hearing be continued as requested,
5 and agrees to the exclusion of time from April 15 to May 6, 2013, pursuant to 18 U.S.C. § 3161
6 (h)(7)(A).

7 5. Accordingly, the parties request that the status hearing be continued to May 6, 2013,
8 at 1:30 p.m.

9 IT IS SO STIPULATED.

Respectfully submitted,

STEVEN G. KALAR
Federal Public Defender

/S/

14 || Dated: April 11, 2013

ROBERT M. CARLIN
Assistant Federal Public Defender

UNITED STATES ATTORNEY

18 || Dated: April 11, 2013

/S/

MEREDITH EDWARDS
Special Assistant United States Attorney

**STIPULATION TO CONTINUE STATUS
CONFERENCE; [PROPOSED] ORDER
CASE NO. CR 13-00057**

1 STEVEN G. KALAR
2 Federal Public Defender
2 ROBERT M. CARLIN
3 Assistant Federal Public Defender
3 160 West Santa Clara Street, Suite 575
3 San Jose, CA 95113
4 Telephone: (408) 291-7753
4 E-mail: westcliff3@gmail.com

5
6 Counsel for Defendant
6 JOSE MONDRAGON-SANCHEZ

7
8 IN THE UNITED STATES DISTRICT COURT
9 FOR THE NORTHERN DISTRICT OF CALIFORNIA
10 SAN JOSE DIVISION

11 UNITED STATES OF AMERICA,) No. CR 13-00057-EJD
12 vs. Plaintiff,) ~~PROPOSED~~ ORDER ON STIPULATION
13) TO CONTINUE STATUS CONFERENCE
14 JOSE MONDRAGON-SANCHEZ,)
15 vs. Defendant.)

17 **~~PROPOSED~~ ORDER AS MODIFIED BY THE COURT**

18 1. Mr. Mondragon has been charged in a single count Information, which was filed on
19 January 28, 2013, with a violation of 8 U.S.C. § 1326.

20 2. A status conference before this Honorable Court is scheduled for April 15, 2013, at
21 1:30 p.m.

22 3. Counsel and Mr. Mondragon need additional time to review the discovery provided by
23 the government. Also, there is a legal issue that needs further research and discussion which
24 could significantly affect the disposition of Mr. Mondragon's case.

25 4. There is good cause for the requested continuance, and the "ends of justice" served by
26 taking such action "outweigh the best interest of the public and the defendant in a speedy trial."

STIPULATION TO CONTINUE STATUS
CONFERENCE; [PROPOSED] ORDER
CASE NO. CR 13-00057

1 18 U.S.C. § 3161 (h)(7)(A). Accordingly, the time from April 15 to May 6, 2013, is excluded
2 pursuant to section § 3161 (h)(7)(A).

3 5. The status hearing in this matter shall be continued to May 6, 2013, at 1:30 p.m.

4 IT IS SO ORDERED.

5

6 Dated: 4/11/2013



HON. EDWARD J. DAVILA
United States District Judge

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26